

IN THE UNITED STATES DISTRICT COURT MAY 27 2009

FOR THE DISTRICT OF NEW MEXICO

MATTHEW J. DYKMAN  
 CLERK

UNITED STATES OF AMERICA, )

Plaintiff, )

vs. )

DAVID A. CHAMPION, )

d/b/a "Everything Is Less," )

Defendant. )

CRIMINAL NO. 09-1434 JC

18 U.S.C. § 2320(a): Trafficking in  
 Counterfeit Goods and Services.

**INFORMATION**

The United States Attorney charges:

On or about October 4, 2004, and on other dates, in Santa Fe County, in the District of New Mexico, and elsewhere, the defendant, **DAVID A. CHAMPION**, doing business as "Everything Is Less," intentionally trafficked in goods and services at auction on eBay, specifically polo-style shirts, while knowingly using on and in connection with such goods and services, counterfeit marks that were identical and substantially indistinguishable from the registered "Lacoste" brand name and alligator mark (i.e., Registration Numbers: 2,004,314; 1,108,987; and 879,171), brand marks that were in use, existing and validly registered for those goods and services by Lacoste Alligator, S.A., on the principal registrar of the United States Patent and Trademark Office, and the use of such counterfeit marks was likely to cause confusion, to cause mistake, and to deceive.

In violation of 18 U.S.C. § 2320(a).

GREGORY J. FOURATT  
United States Attorney

*for Elaine Ramirez*  
WILLIAM J. PFUGRATH  
Assistant United States Attorney